

1 E. MARTIN ESTRADA  
United States Attorney  
2 MACK E. JENKINS  
Assistant United States Attorney  
3 Chief, Criminal Division  
JONATHAN GALATZAN  
4 Assistant United States Attorney  
Chief, Asset Forfeiture & Recovery Section  
5 ALEXANDER SU (Cal. Bar No. 297869)  
Assistant United States Attorney  
6 Asset Forfeiture & Recovery Section  
1400 United States Courthouse  
7 312 North Spring Street  
Los Angeles, California 90012  
8 Telephone: (213) 894-0719  
Facsimile: (213) 894-0141  
9 E-mail: Alexander.Su@usdoj.gov

10 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
11

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 IN THE MATTER OF THE SEIZURE OF  
\$21,150.00 IN U.S. CURRENCY,  
15 \$10,079.00 IN U.S. CURRENCY,  
\$836.00 IN U.S. CURRENCY AND  
16 \$430.00 IN U.S. CURRENCY.

Case No. 2:24-CM-00038

JOINT STIPULATION AND REQUEST TO  
EXTEND THE DEADLINE TO FILE CIVIL  
FORFEITURE COMPLAINT

[PROPOSED ORDER LODGED  
CONTEMPORANEOUSLY HEREWITH]

17  
18  
19 It is hereby stipulated by and between the UNITED STATES OF  
20 AMERICA ("government"), by and through its counsel of record, the  
21 United States Attorney for the Central District of California and  
22 Assistant United States Attorney Alexander Su, and claimants  
23 VINPOWER, INC., SHUO CHANG also known as ("aka") CALVIN CHANG, and  
24 CHIALING YU aka JENNIFER YU ("Claimants"), by and through their  
25 counsel of record, Kevin J. Cole and Jeremy Friedman of KJC Law  
26 Group, as to \$21,150.00 in U.S. Currency (Consolidated Asset  
27 Tracking System Identification Number ("CATS ID") 23-IRS-000789),  
28 \$10,079.00 in U.S. Currency (CATS ID 23-IRS-000790), \$836.00 in U.S.

1 Currency (CATS ID 23-IRS-000788), \$430.00 in U.S. Currency (CATS ID  
2 23-IRS-000787) seized from a building, located at 817 South Palm  
3 Avenue, Alhambra, California 91803, on or about September 29, 2023,  
4 ("Seized Property"), as follows:

5 1. Claimants filed a claim in administrative forfeiture  
6 proceedings with the Internal Revenue Service ("IRS"), with respect  
7 to the Seized Property.

8 2. IRS sent the written notice of intent to forfeit required  
9 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. Under  
10 18 U.S.C. § 983(a)(2)(A)-(E), the time for any person to file a  
11 claim to the Seized Property has either expired or been tolled. No  
12 other person besides Claimants have filed a claim to the Seized  
13 Property, as required by law in administrative forfeiture  
14 proceedings.

15 3. Under 18 U.S.C. § 983(a)(3)(A), the government is required  
16 to file a complaint for forfeiture against the Seized Property  
17 and/or to obtain an indictment alleging that the Seized Property are  
18 subject to forfeiture within 90 days after a claim has been filed in  
19 the administrative forfeiture proceedings, which in this case would  
20 be March 25, 2024, unless the Court extends the deadline for good  
21 cause shown or by agreement of the parties.

22 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish  
23 by agreement to extend to June 24, 2024, the time in which the  
24 government is to file a complaint for forfeiture against the Seized  
25 Property and/or to obtain an indictment alleging that the Seized  
26 Property are subject to forfeiture, so that the government can  
27 further investigate this matter and the parties can determine  
28 whether a resolution is appropriate without the government having to

1 initiate a judicial forfeiture action.

2 5. Claimants knowingly, intelligently, and voluntarily give  
3 up any right Claimants may have under 18 U.S.C. § 983(a)(3)(A) -  
4 (a)(3)(C) to require the government to file a complaint for  
5 forfeiture against the Seized Property and/or to obtain an  
6 indictment alleging that the Seized Property are subject to  
7 forfeiture by March 25, 2024, and any right Claimants may have to  
8 seek dismissal of any complaint and/or any forfeiture allegation in  
9 an indictment on the ground that it was not filed or returned on or  
10 before such date.

11 6. The parties agree that the deadline by which the  
12 government shall be required to file a complaint for forfeiture  
13 against the Seized Property alleging that the Seized Property is  
14 subject to forfeiture be extended to June 24, 2024.

15 ////

16 ////

17 ////

18 ////

1 NOW, THEREFORE, the parties hereto, by and through their  
2 respective attorneys, hereby STIPULATE AND REQUEST that the  
3 government's time to file a complaint for forfeiture against the  
4 Seized Property and/or obtain an indictment in connection with the  
5 Seized Property be extended to and include June 24, 2024.

6 SO STIPULATED.

7 DATED: February 12, 2024

Respectfully submitted,

8 E. MARTIN ESTRADA  
United States Attorney

9 MACK E. JENKINS  
10 Assistant United States Attorney  
Chief, Criminal Division

11 JONATHAN GALATZAN  
12 Assistant United States Attorney  
Chief, Asset Forfeiture & Recovery  
13 Section

14 /s/Alexander Su  
ALEXANDER SU  
15 Assistant United States Attorney

16 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

17 DATED: February 12, 2024

Respectfully submitted,

18 KJC LAW GROUP

19  
20 /s/\*  
21 KEVIN J. COLE  
JEREMY FRIEDMAN

22 Attorneys for Claimants  
23 VINPOWER, INC., SHUO CHANG, and  
CHIALING YU

24  
25 *\*Per Civil Local Rule 5-4.3.4.(a)(2)(i), the filer hereby attests*  
26 *that all other signatories listed, and on whose behalf the filing is*  
*submitted, concur in the filing's content and have authorized the*  
*filing via email.*

**PROOF OF SERVICE BY E-MAIL**

I am a citizen of the United States and a resident of or employed in Los Angeles County, California; my business address is the Office of United States Attorney, 312 North Spring Street, 14th Floor, Los Angeles, California 90012; I am over the age of 18; and I am not a party to the above-titled action;

On February 12, 2024, I served a copy of: **JOINT STIPULATION AND REQUEST TO EXTEND THE DEADLINE TO FILE CIVIL FORFEITURE COMPLAINT** on each person or entity named below by transmitting the document by electronic mail to the e-mail address indicated for receipt of e-mail on the date and place shown below following our ordinary office practices. Each person has given consent to receive service by e-mail.

**TO:** Kevin J. Cole Esq.  
KJC Law Group  
9701 Wilshire Blvd., Suite 1000  
Beverly Hills, CA 90212  
Email: kevin@kjclawgroup.com

I am readily familiar with the practice of this office for transmittal of electronic mail from a desktop computer which allows for confirmation that an e-mail message was sent on a particular day and time. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 12, 2024, at Los Angeles, California.

*Luis F. Chaves*  
**LUIS F. CHAVES**  
Paralegal III, FSA